

To Whom It May Concern:

The Montana Department of Environmental Quality (DEQ) has prepared the following environmental assessment as required by law in ARM 17.4.607(2) and ARM 17.4.609(2). This project involves installing two double-walled fiberglass dual compartment and two double-walled fiberglass single compartment underground storage tanks and double-walled fiberglass piping at the Town Pump #5, 1822 East Custer Avenue, Helena, Montana. The property is located in T10NR3W, Section 17, M.P.M.

The DEQ prepares environmental assessments to inform interested government agencies, public groups, or individuals of a proposed action and to determine whether or not the action may have a significant effect on the human or natural environment. This environmental assessment will be circulated for seven days. After the seven-day comment period, DEQ will decide what action to take regarding this permit.

If you care to comment on this proposed project or the attached environmental assessment, please write or email the Permitting & Compliance Division. Comments must be in writing and must be received by **March 21, 2006**. Our email address is [ustprogram@mt.gov](mailto:ustprogram@mt.gov) and our mailing address is P.O. Box 200901, Helena, MT, 59620-0901.

Sincerely,

Brett G. Smith  
Environmental Engineer Specialist  
Construction Program, UST Section  
Waste and Underground Tank Management Bureau

enc.      Environmental Assessment

O/O NAME: Town Pump, Inc.	FACILITY NO: 60-15029
PERMIT NO: 06-0113	DATE OF APPLICATION: 02/01/2006
PERSON PREPARING EA: Brett G. Smith, Environmental Engineer Specialist	COUNTY: Lewis & Clark
LOCATION: 1822 East Custer Avenue, Helena, Montana T10NR03W Section 17.	
FACILITY NAME: Town Pump #5 Helena	EA COMPLETED: 03/15/06
DESCRIPTION OF PROPOSED ACTION: Installing two 18,000-gallon dual-compartment, one 20,000-gallon single-compartment, and one 10,000-gallon single-compartment fiberglass double-walled petroleum underground storage tanks with double-walled fiberglass piping. The USTs will be installed at a new facility. The piping systems will be pressurized. The tanks will have tank-top sumps with interstitial sensors installed in the sumps and pressurized line leak detectors in the piping.	
DESCRIPTION OF THE BENEFITS AND PURPOSE OF THE PROPOSED ACTION: Purpose is to install new tanks and piping at a new refueling station and convenience store. The benefits include more fuel choices in the Helena area.	

A: Significant unavoidable impacts

B: Potential significant impacts mitigated based upon license conditions

C: Insignificant as proposed

					POTENTIAL IMPACTS	
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
<b>PHYSICAL ENVIRONMENT</b>						
1. <u>TOPOGRAPHY</u> : Are there unusual geologic features? Will the surface features be changed?			X			No impact. Location is currently a semi-developed industrial area next to a sewage treatment plant.
2. <u>GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE</u> : Are fragile, compactible or unstable soils present? Are there special reclamation considerations?			X			Based on a review of neighboring well logs, the predominant soils that are present are sands, gravels and clays. There are no special reclamation considerations for this site.
3. <u>WATER QUALITY, QUANTITY AND DISTRIBUTION</u> : Are important surface or groundwater resources present? Is there potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality?		X				Important water resources are present. There are several domestic groundwater wells as well as a City of Helena public water supply well within one-quarter mile of this project. Average depth of the wells is 66' below ground surface (BGS) with a static water level of 27' BGS. Potential violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality is mitigated by installation of a double-walled tank and electronic tank and piping leak detection.
						Improper operation of this

					POTENTIAL IMPACTS	
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
						system would increase the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, and the degradation of water quality. Leak detection systems serve to mitigate the potential impacts immediately reducing the amount of fuel available to be released into the environment.
4. <u>AIR QUALITY</u> : Will pollutants or particulate be produced? Is the project influenced by air quality regulations or zones (Class I airshed)?			X			Petroleum vapors will be released at this site. Natural air currents and vent pipes will dissipate hydrocarbon vapors to a safe level. The closest Class I Area is the Gates of the Mountains Wilderness Area.
5. <u>DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY</u> : Will the project use resources that are limited in the area? Are there other activities nearby that will affect the project?			X			There are no known resources that are limited in the area. It is unknown if there are other activities nearby that will affect the project.
6. <u>IMPACTS ON OTHER ENVIRONMENTAL RESOURCES</u> : Are there other studies, plans or projects on this tract?			X			There are no known studies, plans or projects that would impact environmental resources on this tract.
7. <u>TERRESTRIAL, AVIAN, AND AQUATIC LIFE AND HABITATS</u> : Is there substantial use of the area by important wildlife, birds or fish?			X			There is no substantial use of this area by wildlife, birds, and fish.
8. <u>VEGETATION COVER, QUANTITY AND QUALITY</u> : Will vegetative communities be permanently altered? Are any rare plants or cover types present?			X			No impact. Project area is currently in a semi-developed area. No rare plants or cover types have been reported to the reviewer.
9. <u>UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES</u> : Are any federally listed threatened or endangered species or identified habitat present? Any wetlands? Any species			X			No federally listed threatened or endangered species, identified habitat, or species of special concern has been reported to the reviewer. A review of the species

					<b>POTENTIAL IMPACTS</b>	
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of special concern?						listed did not reveal that the species were present in the area. Designated wetlands were not noted in this area.
10. <u>HISTORICAL AND ARCHEOLOGICAL SITE</u> : Are any historical, archeological or paleontological resources present?			X			No data relating any historical, archeological or paleontological resources was reported to the reviewer.
11. <u>AESTHETICS</u> : Is the project on a prominent topographical feature? Will it be visible from populated or scenic areas? Will there be excessive noise, light or odors?			X			No impact. Area is currently a semi-developed area just off of Custer Avenue and Washington Street. Noise, light, and odors would be typical for a large convenience store with fuel sales.
12. <u>AGRICULTURE</u> : Will grazing lands, irrigation waters or crop production be affected?			X			Agricultural lands are not adjacent to the project. No impact is anticipated.
<b>HUMAN ENVIRONMENT</b>						
1. <u>SOCIAL STRUCTURES AND MORES</u> : Is some disruption of native or traditional lifestyles or communities possible?			X			It is not anticipated that the project will disrupt native or traditional lifestyles or communities.
2. <u>CULTURAL UNIQUENESS AND DIVERSITY</u> : Will the action cause a shift in some unique quality of the area?			X			It is not anticipated that the project will cause a shift in any unique quality of the area.
3. <u>DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING</u> : Will the project add to the population and require additional housing?			X			It is not anticipated that the project will add to the population or require additional housing.
4. <u>HUMAN HEALTH &amp; SAFETY</u> : Will this project add to health and safety risks in the area?		X				It is anticipated that natural air currents and tank vents will dissipate the hydrocarbon vapors to a safe level. Leak detection equipment is designed to detect releases before serious health or safety problems occur.  Improper operation of this system could impact human health and safety. Leak detection systems and operating requirements mitigate this potential impact by immediately

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						reducing the amount of fuel available to be released into the environment such that it will impact health and human safety.
5. <u>COMMUNITY &amp; PERSONAL INCOME</u> : Will the facility generate or degrade income?			X			The improvements to this facility will generate income.
6. <u>QUANTITY AND DISTRIBUTION OF EMPLOYMENT</u> : Will the project create, move or eliminate jobs? If so, estimate jobs.			X			This project is estimated to create several new local jobs.
7. <u>LOCAL AND STATE TAX BASE REVENUES</u> : Will the project create or eliminate tax revenue?			X			This project will increase the value of the property and therefore increase property taxes.
8. <u>DEMAND FOR GOVERNMENT SERVICES</u> : Will substantial traffic be added to existing roads? Will other services (fire protection, police, schools, etc.) be needed?			X			Local traffic will increase somewhat. Other services will not be required.
9. <u>INDUSTRIAL, COMMERCIAL AND AGRICULTURAL ACTIVITIES AND PRODUCTION</u> : Will the project add to or alter these activities?			X			No significant impacts are anticipated since the area is currently commercial and residential.
10. <u>ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES</u> : Are wilderness or recreational areas nearby or accessed through this tract? Is there recreational potential within the tract?			X			No recreational areas are accessed through this property. There is no recreational potential within this tract.
11. <u>AESTHETICS</u> : Is the project on a prominent topographical feature? Will it be visible from populated or scenic areas? Will there be excessive noise, light or odors?			X			No impact. Area is currently a semi-developed area. Noise, light, and odors would be typical for a convenience store with fuel sales.
12. <u>LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS</u> : Are there state, county, city, USFS, BLM, tribal, etc., zoning or management plans in effect?			X			This project is located in the Lewis & Clark County Planning Jurisdictional Area.
13. <u>TRANSPORTATION</u> : Will the project affect local transportation networks and traffic flow?			X		X	This project will not affect local transportation networks and traffic flow unless improper operation leads to emergency spill

					POTENTIAL IMPACTS	
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
						response.

PUBLIC INVOLVEMENT: The department has attempted to identify interested parties to this application and provide the opportunity for public comment. A copy of this Environmental Assessment of the proposed underground storage tank installation has also been posted at our website (<http://www.deq.mt.gov/ea.asp>). Substantive comment may also be provided to email address at [ustprogram@mt.gov](mailto:ustprogram@mt.gov)

ALTERNATIVES CONSIDERED: No other alternatives were presented or considered.

COMPLIANCE STATUS: This project, as permitted, will be in compliance with the UST regulations. The facility must, however, be operated and maintained in accordance with the UST rules and regulations. This facility is required to have a compliance inspection done within 120 days of the installation of the tank systems.

RECOMMENDATIONS CONCERNING PREPARATION OF AN EIS: Not necessary at this time based upon the information reviewed. The project, as proposed with mandatory operating and permit conditions, will not have a significant environmental impact.

OTHER GROUPS OR AGENCIES CONTACTED OR WHICH MAY HAVE OVERLAPPING JURISDICTION: The Montana Department of Justice, Fire Prevention and Investigation Bureau regulates aboveground components.

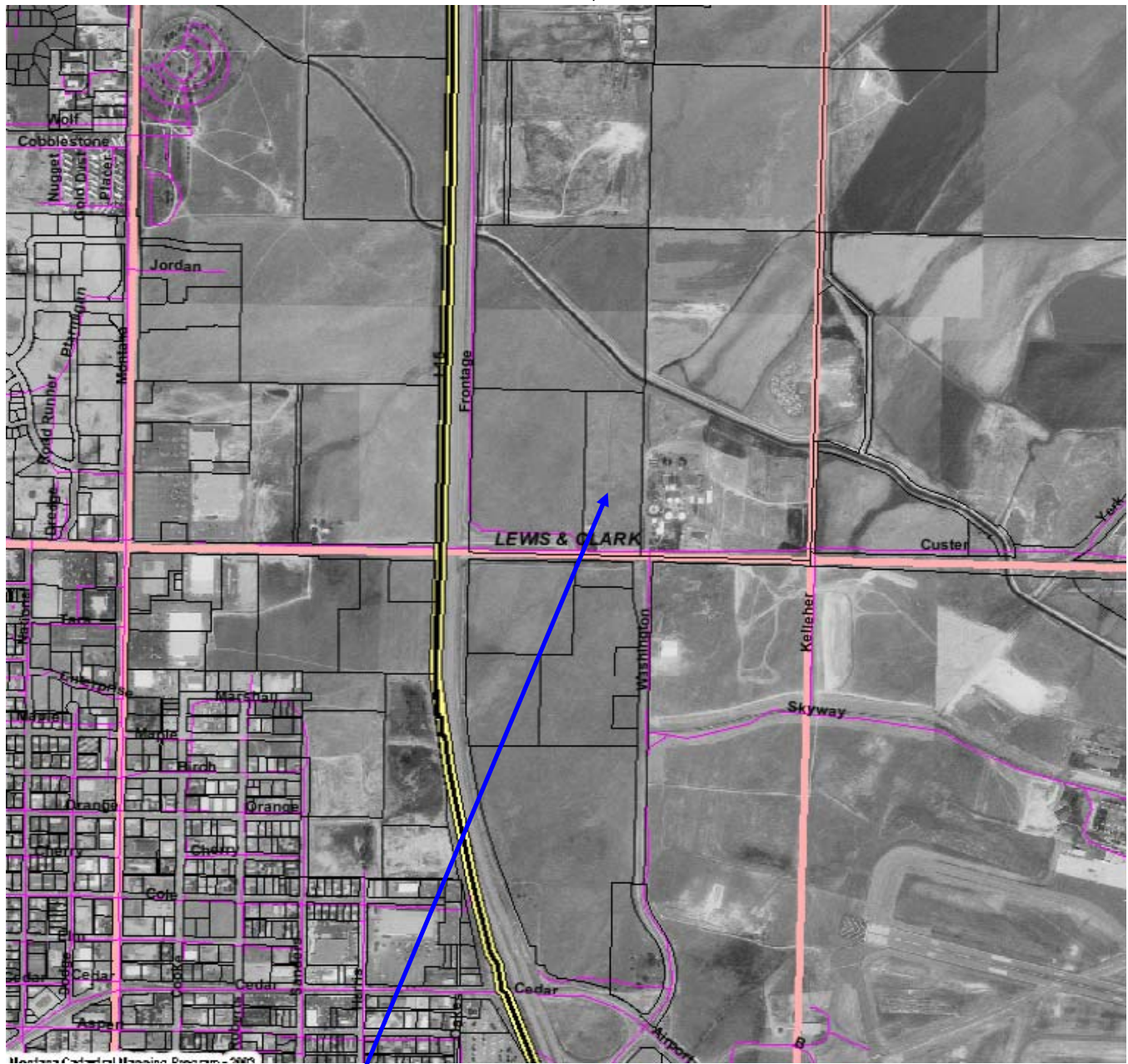
INDIVIDUALS OR GROUPS CONTRIBUTING TO THIS EA: The owner, the contractor, and the preparer of the EA.

PERMIT CONDITION EFFECTS: Permit conditions are based on Montana and federal regulations, PEI RP100-2000 and accepted standard engineering practices.

cc: Governor's Office  
Legislative Environmental Policy Office  
Jerry Grebenc, Lewis and Clark County Planning Department, City-County Building, 316 North Park, P.O. Box 1725, Helena, MT 59624

Figures: Aerial Photograph of Site  
Contractor's Site Plan

## Town Pump #5 Helena, MT



Project Location

## Town Pump #5 Helena, MT

